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April 26, 2012

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Applications of Cellco Partnership d/b/a Verizon Wireless, SpectrumCo LLC, and Cox
TMI Wireless, LLC, WT Docket No. 12-4
Notice of *Ex Parte* Meeting

Dear Ms. Dortch,

On April 24, 2012, Derek Turner, Research Director of Free Press and Joel Kelsey, Policy Advisor of Free Press met with Sandra Danner, Paul Murray, Tom Peters, Jim Schlichting, Susan Singer, and Melissa Tye of the Wireless Telecommunications Bureau; Martha Heller and Jessica Campbell of the Media Bureau; Jim Bird, Virginia Metallo and Joel Rabinovitz of the Office of General Counsel; Christopher Sova of the Wireline Competition Bureau; and Marius Schwartz, FCC Chief Economist.

During the meeting Free Press discussed findings from our preliminary review of Verizon's initial responses to the Commission's *Request for Information*. We presented arguments and evidence that suggest Verizon's claims of need for additional spectrum are vastly overstated. We also presented arguments and evidence that indicate Verizon is vastly overstating its need for *these specific* AWS licenses, particularly those in the eastern 2/3 of the U.S. where Verizon already holds AWS spectrum. We discussed evidence supporting our prior arguments that Verizon has numerous other methods to handle future traffic increases in a manner that would not foreclose a future of increased competition in the wireless market. We also presented evidence that gives insight into Verizon's contrarian attitude about the efficiency and pro-consumer benefits of WiFi offloading, as expressed by the company in its *Application* and *Reply to Opposition*. Finally, we noted the difficulties we have encountered searching through materials provided by Verizon, echoing the sentiments expressed by Free Press and other parties in an April 24th letter filed by Public Knowledge.

The presentation by Free Press was based on a slide deck containing confidential and highly confidential information subject to the protective orders in this proceeding. This

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information was exclusively drawn from documents submitted to the Commission by Verizon on March 22, 2012. The slide deck is redacted in its entirety from this public filing. Both paper and electronic unredacted highly confidential copies of the slides are being delivered today to the Commission, pursuant to the terms of the protective orders in the above-referenced proceeding.

Sincerely,

/s/

S. Derek Turner
Research Director
Free Press
dturner@freepress.net

CC via email (redacted copy):

Sandra Danner
Paul Murray
Tom Peters
Jim Schlichting
Susan Singer
Melissa Tye
Martha Heller
Jessica Campbell
Jim Bird
Virginia Metallo
Joel Rabinovitz
Christopher Sova
Marius Schwartz

CC via U.S. mail (unredacted copy):

Nancy J. Victory, Counsel for Verizon Wireless
Michael Samssock, Verizon

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**HIGHLY
CONFIDENTIAL
ATTACHMENT
OMITTED**